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4 Counsel for Defendant PINEDA
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6 UNITED STATES DISTRICT COURT
 7 NORTHERN DISTRICT OF CALIFORNIA
 8 SAN FRANCISCO DIVISION
 9

10 UNITED STATES OF AMERICA,) NO. CR 23-00130 JD (LB)
11 Plaintiff,)
12 v.) STIPULATION AND PROPOSED ORDER TO
13 SEVERO PINEDA,) CONTINUE DEFENDANT SEVERO PINEDA'S
14 Defendant.) MAY 12, 2025 CHANGE OF PLEA HEARING
15) TO JUNE 23, 2025

16
 17 Counsel for defendant Severo Pineda and counsel for the United States, Assistant United States
 18 Attorney Dan Karmel hereby stipulate and request a continuance of the change of plea hearing currently
 19 scheduled for May 12, 2025.

20 Undersigned defense counsel for Mr. Pineda makes the request in order to enable the parties to
 21 finalize their plea agreement. It is anticipated that Mr. Pineda will plead guilty to the Superseding
 22 Information in this case. The parties are available on June 23, 2025. Mr. Pineda has been compliant
 23 with the conditions of his pretrial release and undersigned counsel has confirmed that he is in regular
 24 contact with his assigned officer.

25 Furthermore, counsel for the United States and undersigned counsel for Severo Pineda stipulate
 26 that time should be excluded under the Speedy Trial Act from May 12, 2025, through June 23, 2025.

27 The government and counsel for the defendant agree that time should be excluded under the Speedy

28 STIPULATION TO CONTINUE MAY 12, 2025:
 CHANGE OF PLEA HEARING TO JUNE 23, 2025;
~~PROPOSED~~ ORDER
 Case No. CR 23-00130 JD (LB)

v. 7/10/2018

1 Trial Act so that defense counsel can be available for the hearing and continue to prepare including by
 2 reviewing discovery produced by the government. The parties therefore stipulate and agree that
 3 excluding time until June 23, 2025, will allow for the continuity and effective preparation of counsel.
 4 *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served
 5 by excluding the time from May 12, 2025, through June 23, 2025, from computation under the Speedy
 6 Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. §
 7 3161(h)(7)(A), (B)(iv).

8 The undersigned defense counsel certifies that she has obtained the approval of the Assistant
 9 United States Attorney to file this stipulation and proposed order.

10 DATED: May 4, 2025. /s/ K. Alexandra McClure

11 K. ALEXANDRA MCCLURE
 12 Counsel for Defendant SEVERO PINEDA

13 DATED: May 4, 2025. /s/ Dan Karmel

14 DAN KARMEL
 15 Counsel for THE UNITED STATES

16 **~~[PROPOSED]~~ ORDER**

17 Based upon the facts set forth in the stipulation of the parties and for good cause shown, the
 18 change of plea hearing currently scheduled for May 12, 2025, is continued to June 23, 2025, at
 19 10:30 a.m. Time is excluded under the Speedy Trial Act to and including June 23, 2025.

20
 21 IT IS SO ORDERED.

22 DATED: May 7, 2025

23 
 24 HON. JAMES DONATO
 25 United States District Court Judge

26
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 28 STIPULATION TO CONTINUE MAY 12, 2025:
 CHANGE OF PLEA HEARING TO JUNE 23, 2025;
~~[PROPOSED]~~ ORDER
 Case No. CR 23-00130 JD (LB)